

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ASHOT EGIAZARYAN

v.

PETER ZALMAYEV

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No. 1:11-cv-02670 (PKC) (GWG)

DECLARATION OF THOMAS B. ROBERTS

THOMAS B. ROBERTS declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am one of Peter Zalmayev's lawyers, and I submit this declaration in support of Mr. Zalmayev's opposition to Clear Voice, Inc. and Suren Egiazaryan's motion to quash the subpoenas addressed to Wells Fargo Bank, N.A.

2. Attached as Exhibit 1 is a true and correct copy the transcript of the proceedings before Magistrate Judge Gorenstein on December 22, 2011.

3. Attached as Exhibits 2 is a true and correct copy of the declaration of Garkusha Dmitrii Vladimirovich dated July 22, 2011 and its translation into English.

4. Attached as Exhibit 3 is a true and correct copy of the declaration of Andrey Gloriozov dated October 6, 2011 with its exhibits.

5. Upon information and belief, attached as Exhibit 4 is a true and correct copy of statements of account for an United States Dollar account maintained by Mogford Impex Corporation at Banques SCS Alliance S.A., a Swiss bank that changed its name in 2009 to Compagnie Bancaire Helvetique. The account numbers have been redacted.

6. Upon information and belief, attached as Exhibit 5 is a true and correct copy of certain transfer statements for accounts in United States Dollars and in Euros maintained by Mogford Impex Corporation at Hypo Investment Bank (Liechtenstein) AG, a Liechtenstein bank that changed its name in 2009 to Valartis Bank (Liechtenstein) AG. The account numbers have been redacted.

7. Attached as Exhibit 6 is a true and correct copy of an email chain beginning on December 18, 2011 from Thomas B. Roberts to Terry Bell and ending January 5, 2012 from James Golden to Michael Rakower.

8. Upon information and belief, attached as Exhibit 7 is a true and correct copy of the criminal accusation against Ashot Egiazaryan issued by the Investigator for Particularly

Important Cases of the Chief Investigative Directorate, Moscow,
dated December 27, 2010 and its translation into English.

/s/ Thomas B. Roberts

THOMAS B. ROBERTS (TR5233)

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